

Northwest Area Contingency Plan



6 November 1998

U. S. Coast Guard
Captain of the Port
Portland, Oregon

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TABLE OF CONTENTS

Northwest Area Contingency Plan

8200 INTRODUCTION.....	1
8200 8200-8210	
Introduction.....	1
8201 8212-8211 Authority.....	1
8213Definitions and Acronyms.....	2
8213.1U.S. Coast Guard Policy.....	2
8202 8213.2 District/Area Committee Purpose and Objectives.....	3
8203 8213.3Area Subdivisions.....	3
8204 8213.4Area of Responsibility.....	3
8205 8214 Area Committee Organization.....	3
8206 8214 Portland Policy, Purpose and Objectives.....	3
8207 8214.1	
Coordinated Marine Firefighting Considerations.....	4
8214.2 Area of Responsibility.....	4
8214.3 Maritime Fire and Safety Association (MFSA).....	4
8214.4 Fire Protection Agency Advisory Council (FPAAC).....	5
8215 Geographic Boundaries.....	6
8215.1 Sensitive Areas.....	6
8216 Response Organization and Policies.....	6
8216.1 National Response System (National Inter-Agency Incident Management System [NIIMS] Incident Command System).....	6
8216.2 National Response Policy.....	6
8216.3 State Response System.....	6
8216.4 State Response Policy.....	6
8216.5 Local Response System.....	6
8216.6 Local Response Policy.....	6
8216.7 Vessel/Facility Owner Policy.....	8
8216.8 Incident Commander.....	8
8217 Plan Review and Update.....	8
8218 Exercises/Drills.....	8
8219 Training.....	9
8220 COMMAND STRUCTURE.....	11
8221 Command Staff.....	12
8222 Command Structure – Unified Command.....	12
8223 Health and Safety Officer.....	12
8223.1 Health and Safety Officer On Site.....	12
8224 Public Affairs Information Officer.....	12
8224.1 General Advice on Dealing With News Media.....	13
8224.2 Logistical Concerns for Press.....	14
8224.3 Media Contacts.....	14
8224.4 Media Addresses.....	14
8224.5 Joint Information Center.....	14
8224.6 News Release Samples.....	14

Northwest Area Contingency Plan

8224.7	Sample Fact Sheet.....	14
8224.8	Sample Press Release.....	
8224.9	Sample News Advisory.....	14
8224.10	Checklist.....	14
8225	Legal Officer.....	14
8226	Marine Firefighting Coordinator.....	14
8227	Command Posts.....	14
8230	OPERATIONS.....	15
8231	Emergency Notifications.....	15
8231.1	MSO/Group Portland Internal Notifications.....	15
8231.2	Notification of External Parties.....	15
8232	Burning Vessel Movement Considerations.....	15
8232.1	Decision to Allow A Burning Vessel to Enter Port or Move Within The Port.....	19
8233	Offshore Firefighting Considerations.....	19
8233.1	Coast Guard Offshore Resources.....	19
8233.2	Department of Defense Offshore Resources.....	19
8233.3	Other Offshore Resources.....	20
8233.4	Offshore Scuttling Area Selection.....	20
8234	Positioning A Vessel For Fire Fighting.....	20
8234.1	Pier Selection.....	20
8234.2	Anchorage And Grounding Site Selection.....	21
8235	Response Actions.....	21
8235.1	Coast Guard Action in a Fire Department's Jurisdiction Within Group Portland's SAR Zone And COTP Portland's Zone.....	22
8235.2	Coast Guard Action Within Fire Department Jurisdiction Within COTP Portland's Zone But Outside of Group Portland's SAR Area (Gray's Harbor, Astoria, Coos Bay, and Newport).....	25
8235.3	Fire Occurring Outside a Fire Department's Jurisdiction But Within COTP Portland's Zone.....	25
8236	Safety Zones.....	26
8237	Communications.....	26
8238	Stability.....	27
8240	PLANNING.....	28
8241	Introduction.....	28
8242	Inclusion in Area Contingency Plan and Geographical Response Plans.....	28
8243	Annual Review and Update.....	29

Northwest Area Contingency Plan

8250	LOGISTICS.....	29
8251	Equipment Lists Per Location.....	29
8260	FINANCE.....	29
8261	Funding.....	29
8262	Liability/Surety Bond/COFR.....	29
8270	FOR DISTRICT/AREA COMMITTEE DESIGNATION.....	30
8280	FOR DISTRICT/AREA COMMITTEE DESIGNATION.....	30
8290	RESERVED FOR FUTURE HEADQUARTERS DESIGNATION.....	30

ANNEX A MARINE FIRE RESPONSE PROCEDURES

1. General Guidance for CAC
2. Marine Fire Action Plan
3. Action Checklist For Vessel Fire
4. Merchant Vessel Maritime Fire Fighting Guide

ANNEX B

SHIPBOARD FIRE OPERATIONS GUIDE

1. Ship Firefighting Management System
2. Agency/Vessel Contract (example)
3. MFSA Call Out
4. Blue Worksheet
5. Fire Boat Request

ANNEX C

SPECIFIC INFORMATION FOR EACH PORT

1. Portland, OR
2. Vancouver, WA
3. Saint Helens, OR
4. Kalama, WA
5. Longview, WA
6. Clatskanie, OR
7. Astoria, OR
8. Newport, OR
9. Coos Bay & North Bend, OR
10. Grays Harbor, WA
11. Hood River, The Dalles, & Umatilla, OR
12. Kennewick, Richland, & Pasco, WA
13. Lewiston, ID & Clarkston, WA

Northwest Area Contingency Plan

ANNEX D

BURNING VESSEL RELOCATION SITES

1. Vessel Relocation Sites
2. Portland/Vancouver Area Grounding, Mooring & Anchorage Sites
3. Longview/Kalama Area Grounding & Anchorage Sites
4. Astoria Mooring & Grounding Sites
5. Newport Area Mooring Sites
6. Coos Bay/North Bend Area Anchorage & Mooring Sites
7. Grays Harbor Grounding & Mooring Sites
- 8.

ANNEX E

OFFSHORE SCUTTling AREAS

ANNEX F

ORGANIZATIONAL CHARTS for USCG MSO/GROUP PORTLAND

ANNEX G

U. S. COAST GUARD & DEPARTMENT OF DEFENSE RESOURCES

ANNEX H

SALVAGE COMPANIES

ANNEX I

INTERPRETERS

ANNEX J

MARINE CHEMISTS

ANNEX K

HAZARDOUS MATERIAL

ANNEX L

ICS FORMS

ANNEX M DISTRIBUTION

Northwest Area Contingency Plan

8200 INTRODUCTION

8210 Introduction

This plan is intended to inform persons assigned to Group/MSO Portland of their roles, appropriate actions, available resources, and current policy and procedures related to marine fire response. The main body of this Plan gives background information while the annexes offer information needed during an actual marine fire response. Therefore, anybody assigned a role in marine fire response should first, know his/her role in such an event, second, read through this document emphasizing sections most relevant to his/her role, and third, become familiar with the annexes so that he/she is able to refer to needed annexes quickly during an event.

This Plan has been reformatted to meet Integrated Command System requirements.

8211 Authority

The U.S. Coast Guard has no specific statutory responsibility to fight marine fires. Traditionally, the Coast Guard has been responsible for saving life and property upon the waters of the United States and typically will respond to a marine fire in some manner. To this extent, various statutes are used when establishing its authority to respond to marine fires.

The statutes follow:

- 14 USC 88(b): USCG must render aid to save life and property when a marine emergency occurs within the capabilities of available resources. This may include marine fires.
- Clean Water Act as amended by the Oil Pollution Act 1990 (OPA 90) (33 USC 1251 et seq.): whenever a marine disaster in navigable waters or exclusive economic zone of the U.S. has created a substantial threat of pollution because of a discharge or an imminent discharge of large quantities of oil or hazardous substance from a vessel, USCG may coordinate and direct all public and private efforts directed at removal or elimination of such a threat and summarily remove and destroy such a vessel if necessary. This Act mandates USCG to maintain an Area Contingency Plan including firefighting equipment within each port.

Northwest Area Contingency Plan

- The Intervention on the High Seas Act (33 USC 1471, et seq.): this extends USCG's authority to take similar preemptive or corrective action on the high seas. Specifically, it authorizes the Commandant of the U.S. Coast Guard to take necessary measures on the high seas to prevent, mitigate, or eliminate grave and imminent danger to the coastline or related interests from pollution or threat of pollution, following a maritime casualty or acts related to such a casualty which may reasonably be expected to result in major harmful consequences. This authority rests with the Commandant.
- The Ports and Waterways Safety Act (33 USC 1221, et seq.): this charges U.S. Coast Guard's local Captain of the Port with responsibility for vessel navigation and safety, safety of waterfront facilities, and protection of the marine environment within the COTP's area of jurisdiction. This authority allows the COTP to:
 - Direct anchoring, mooring, or movement of vessel;
 - Specify times of vessel entry, movement, departure to, from, or through ports, harbors, or other waters;
 - Restrict vessel operation in hazardous areas; or
 - Direct the handling, loading, discharge, storage, and movement – including emergency removal, control, and disposition – of explosives or other dangerous cargo/substances, on any bridge or other structure on or in the navigable waters of the U.S. or any land structure immediately adjacent to those water
- 42 USC 1856-1856d: allows an agency, charged with providing fire protection for any property of the U.S., to enter into reciprocal agreements with state and local fire fighting organizations to provide mutual aid. This statute further provides that emergency assistance may be rendered in the absence of a reciprocal agreement, when it is determined by the head of that agency to be in the best interest of the U.S.

The Coast Guard cannot delegate its statutory authorities and shall not delegate mission responsibilities to state or local agencies. The MSO shall not be party to any agreement that relinquishes Coast Guard authority, evades Coast Guard responsibility, or places MSO military personnel under the command of any person(s) who is/are not part of the Federal military establishment. Coast Guard forces will not be subject to any authority other than that of their superiors in the

Northwest Area Contingency Plan

chain of command. Within the Coast Guard, the COTP will delegate authorities as necessary.

8212 Definitions and Acronyms

8213 U.S. Coast Guard Policy

Federal policy is established in the Federal Fire Prevention and Control Act of 1974 (PL 93-498). It states that fire prevention and control is, and should, remain a state and local responsibility, although the federal government must help to reduce fire loss. The ultimate responsibility is always the vessel or facility owner and operator.

The U.S. Coast Guard has traditionally provided fire fighting equipment and training to protect its own vessels and property. Captains of the Port are also called upon to provide assistance at major fires on board other vessels and waterfront facilities. Although the Coast Guard clearly has interest in fighting fires involving vessels or waterfront facilities, local authorities are principally responsible for maintaining necessary fire fighting utilities in U.S. ports and harbors. USCG renders assistance as available, based on the availability of resources and level of training. The Commandant intends to maintain this traditional “assistance-as-available” posture without conveying the impression that the USCG is prepared to relieve local fire departments of their responsibilities.

The presence of local fire fighters does not relieve the master of command of, or transfer the master’s responsibility for overall safety on, the vessel. However, the master should not normally countermand any orders given by the local fire fighters on board the vessel, unless the action taken or planned clearly endangers the safety of the vessel or crew.

Paramount in preparing for vessel or waterfront fires is the need to integrate USCG planning and training efforts with those of other responsible organizations, particularly local fire departments and port authorities. COTP’s shall work closely with the municipal fire departments, vessel and facility owners and operators, mutual aid groups, and other interested organizations. The COTP shall develop a fire fighting contingency plan that addresses fire fighting in each port in the COTP zone.

8213.1 District/Area Committee Purpose and Objectives

8213.2 Area Subdivisions

Northwest Area Contingency Plan

8213.3 Area of Responsibility

8213.4 Area Committee Organization

8214 COTP Portland Policy, Purpose and Objectives

8214.1 Coordinated Marine Firefighting Considerations

In any fire, the quickness and effectiveness of the initial response is the key to fire suppression. If the fire is not quickly controlled, the likelihood of a larger, more involved response increases. In addition, today's fires may be very complex as they increasingly involve a number of hazardous materials ranging from bulk liquids to toxic solids.

Therefore, a closely coordinated effort is essential factor in an effective marine fire fighting response. The response organization will vary depending on the location of the fire and its severity. The level of Coast Guard involvement will range from On-Scene Commander to coordinator/advisor level. The possibility of a spill of some type of pollutant always exists due to firefighting water runoff. The COTP, in the capacity as On-Scene Coordinator, will invariably be involved should this occur. The following sections discuss some of the complexities involved in a coordinated response and guidelines for proper organization and action.

8214.2 Area of Responsibility

The level of Coast Guard firefighting response will depend largely on the location of the fire. For this reason, a discussion of the various areas of responsibility is in order.

The COTP Portland, Oregon, zone is described in 33 CFR 3.65-15.

The Group Portland Search and Rescue zone includes the navigable waters of the Willamette River from the mouth to river mile 183.2 (Eugene area). It also encompasses the Columbia River from river mile 48 to river mile 335 (Richland, Washington) and between the mouth of the Snake River and the Ice Harbor Lock and Dam (Snake River mile 9.7). Group Astoria has SAR responsibility on the lower Columbia River and portions of southern Washington, including Grays Harbor, and the northern Oregon coast. The remainder of the Oregon coast is the responsibility of Group North Bend.

Northwest Area Contingency Plan

The COTP Portland's zone for response to a pollution incident is described in the "COTP Portland, Oregon, Oil and Hazardous Substances Pollution Contingency Plan." It is possible that a fire with resulting pollution could occur where the EPA has pollution response responsibilities. If this were to occur, the MSO would likely respond to the fire until the EPA representative arrived on scene.

8214.3 Maritime Fire and Safety Association (MFSA)

In February 1982, the 600-foot grain ship, Protector Alpha, caught fire while being loaded in Kalama, WA on the Columbia River. The shipboard blaze raged for 72 hours before the fire was controlled. The local fire district was not trained nor equipped to respond and believed its boundaries ended at the pier. The ship's foreign crew abandoned her.

The vessel was set adrift in the river while burning before fire fighters aboard could be evacuated. The ship eventually ran aground. One Coast Guardsman was killed and another fire fighter was injured battling the fire. Damage to the ship exceeded \$15 million.

While serious shipboard fires are unusual, they are not unknown, as the Protector Alpha incident shows. A number of ship fires have resulted in over one hundred casualties. A single incident in the Columbia River could block the shipping lane or damage a key facility effectively choking the region's commerce.

In the aftermath of the Protector Alpha incident, the U.S. Coast Guard called together the maritime community, forming an ad hoc committee to review the situation. The committee found serious deficiencies in the region's capability to handle shipboard and waterfront fires.

In response, the group organized the Maritime Fire Safety Association (MFSA). The new organization's purpose was to put into place a system to ensure an adequate, timely, and well-coordinated response to shipboard fires over the entire 110-mile channel of the Lower Columbia River.

Multiple jurisdictions are involved: two states, seven counties, fourteen cities, seven port districts, and over twenty local fire departments. Compounding the complexity, fire district boundaries in both Oregon and Washington generally end at the shoreline. All members of the MFSA have agreed to work together and train together, so that when an incident occurs, each fire bureau will be familiar with the resources and capabilities of other fire bureaus.

Northwest Area Contingency Plan

No single entity has responsibility for fighting marine fires in and along the river. While the USCG is commonly thought to be responsible for such fires, its authority and responsibility are not comprehensive.

Early in 1984, consultants working on behalf of MFSA were retained to prepare a plan for handling marine fires in the Lower Columbia. The Lower Columbia Maritime Fire Safety Plan (1985) incorporated MFSA's program in a proposed framework for building a limited marine fire response capability along the Columbia River from the Portland/Vancouver harbor to Astoria, Oregon, near the mouth of the river. The Plan represented a significant step in creating an effective system for handling shipboard fires.

This Plan was further fine-tuned and the MFSA has now developed the Shipboard Fire Operations Guide. It is a detailed guide that brings together all the MFSA member fire departments along the Lower Columbia River. This document serves as a mutual aid agreement and resource guide for marine fires occurring within the MFSA boundaries.

8214.4 Fire Protection Agency Advisory Council (FPAAC)

This is the group that was tasked to develop MFSA's Shipboard Fire Operations Guide to utilize in fire response in their AOR. This Guide is contained in Annex III.

8215 Geographic Boundaries

Please refer to section 8105.2 Area of Responsibility for a description of geographical boundaries. There are also maps and charts in the CAC with various boundaries depending upon appropriate USCG jurisdictions and responsibilities.

8215.1 Sensitive Areas

There are descriptions and maps in the Thirteenth District GRP's showing environmentally sensitive areas within the COTP's AOR.

8216 Response Organization and Policies

8216.1 National Response System (National Inter-Agency Incident Management System [NIIMS] Incident Command System)

Local fire departments follow the Incident Command System known as ICS. The U.S. Coast Guard has also adopted this emergency command structure. It is highly recommended that Coast Guard personnel assigned to marine fire

Northwest Area Contingency Plan

response get adequate training in this system. Refer to Annex XI containing ICS forms.

8216.2 National Response Policy

8216.3 State Response System

8216.4 State Response Policy

8216.5 Local Response System

8216.6 Local Response Policy

The Portland Fire Bureau responds to all fires within the established boundaries of the city of Portland, Oregon. This area includes the Port of Portland piers/docks and most waterfront facilities. Facilities located in the “Rivergate” area have been annexed by the city and are now covered by Portland Fire Bureau protection. Sauvie Island now has a volunteer fire department that falls under Multnomah County Fire District 30. Hayden Island is covered by Portland Fire Bureau, except the area west of the Railroad Bridge. The lower Willamette River, North Portland Harbor, and the Columbia River from the shore to the center of the navigable channel constrained by the city’s east/west boundary area are covered by the Portland Fire Bureau. Vessels moored to piers in protected areas are also provided firefighting services. The Portland Fire Bureau has mutual aid and response agreements with the Vancouver Fire Department and has merged with the Multnomah County Fire District 10 (East County).

The Vancouver Fire Department responds to fires within the city limits, which includes most waterfront facilities. Vessels moored to piers at the Port of Vancouver are provided fire protection. Vancouver has a mutual aid agreement with Portland for the use of two engines and one fire truck (Note: a truck carries ladders, and its crews generally perform rescue work. An engine carries hoses and water, and its crews are involved with fire suppression.) Since the Vancouver Fire Department does not have a fireboat, if there were a fire in Vancouver’s marine jurisdiction, a fireboat would most likely be requested from the Portland Fire Bureau. In addition, the MFSA agreement provides enough flexibility whereby a “marine coordinator” could be provided to the Vancouver Fire Department from the Portland Fire Bureau. A “marine coordinator” is an individual trained in marine fire fighting who should function as an advisor on scene.

Northwest Area Contingency Plan

The St. Helens Fire Department responds to fires within the city limits of St. Helens and its pleasure craft marinas, piers, and docks. Its boundary to the north is Martin Bluff on the Columbia River and Scapoose Bay on the Multnomah Channel to the south. The Department has on 26-foot fireboat and a crew of 24 regular and approximately 15 volunteer fire fighters, which can be utilized for response in support of MFSA mutual agreements. A certain number of these people will be support personnel and will not be active firefighters.

The Longview Fire Department responds to fires within the city limits of Longview. This jurisdiction includes all of the Port of Longview piers. However, a number of waterfront facilities are not within the city limits and special agreements are required and exist to provide fire protection. The jurisdiction of the Longview Fire Department ends at the end of the pier, so that vessels are not provided fire protection automatically. The Longview Fire Department has a contract drafted, which a master or agent must sign prior to receiving fire fighting assistance. The contract specifies the cost of services and that the expense will be paid by the vessel's owner/agent. The Longview Fire Department has mutual aid agreements with the Cowlitz County Fire Districts No. 2 and No. 5. This agreement binds the signatory departments to respond only to those areas within the jurisdictional boundaries of the department requesting assistance. In other words, if one department enters into a fire protection agreement with a facility that is not within the department's jurisdiction, the other fire departments are not bound to respond to mutual aid requests to assistance at that facility. This situation presently exists in portions of the Longview waterfront. However, contracts are in effect which make provisions for fire departments who normally respond to mutual aid requests to respond to these facilities and be reimbursed for costs incurred.

The Kalama area has three major waterfront facilities: the Peavey Grain Terminal, Kalama Chemical, and the Harvest States Cooperative Grain Terminal. The grain terminal is not within the city limits. However, it has an agreement with Kalama Fire Department for fire protection of the facility. The Kalama Fire Department does not have the capability to respond to shipboard fires. A similar problem with mutual assistance agreements as outlined under the Longview section exists here also. The grain terminal is not within the Kalama Fire Department's normal jurisdiction, and mutual aid agreements which Kalama has signed are not in effect should a fire break out.

The Aberdeen Fire Department responds to all fires at waterfront facilities and aboard vessels moored to those facilities. The local fire departments of Hoquiam, Cosmopolis, and Westport will also respond to waterfront fires. All four fire departments have entered into a mutual aid agreement and will pool their resources in the event of a significant emergency.

Northwest Area Contingency Plan

The Astoria Fire Department will respond to all fires along the waterfront, as well as aboard ships. Fire fighting personnel have received specialized training and equipment for shipboard fire fighting from MFSA. The fire department is an active participant in MFSA, as are the other fire districts along the Columbia and Willamette Rivers.

The Coos Bay and North Bend Fire Departments will respond to all fires along the waterfront and aboard ships. Both fire departments have entered into a mutual assistance agreement with each other.

The Newport Fire Department, with the assistance of the Coast Guard Station Yaquina Bay, responds to all marine fires in the local area. Newport has a mutual assistance agreement with Toledo, Oregon.

Refer to Annex III for specific information on each port and fire department.

8216.7 Vessel/Facility Owner Policy

8216.8 Incident Commander

8217 Plan Review And Update

MSO Portland is tasked to annually review and update this Plan. The review will ensure that changes in personnel, telephone numbers, available resources, U.S. Coast Guard policy, laws and regulations, or any other relevant information is accurately reflected. Exercise lessons learned will also be incorporated in this Plan.

8218 Exercises/Drills

Coordination between agencies requires knowledge of the capabilities of each participating agency. Those personnel who are expected to be involved in the response effort should devote time to understanding the response organization and methods utilized by other agencies. Exercises with other fire fighting organizations should be conducted annually. The results of these interactions should be used to further update and fine-tune this plan. Typically, MSO/Group Portland participates with MFSA and marine response exercise annually.

8219 Training

Northwest Area Contingency Plan

Part of every effective contingency plan is the design and implementation of a training program. Coast Guard personnel rarely encounter actual firefighting. Therefore, to overcome apprehensions and develop expertise, a systematic training program is essential.

Individual Coast Guard units should maintain in-house fire prevention and firefighting training programs to improve skills and familiarize personnel with relevant concepts and Coast Guard equipment. In addition, unit training programs should include familiarity with the Marine Safety Manual, Volume VI, Chapter 8 and Integrated Command System (ICS), and NFPA 1405.

There are some resident marine firefighting training providers in the Pacific Northwest. For certain USCG unit personnel, these courses are very appropriate.

Fremont Maritime in Seattle, WA provides classes ranging from one-day orientations to five-day advanced classes certified by USCG and IMO for ship's crews. Classes include a balance of classroom and simulation exercises. The USCG written exam for licensed officers is required to pass the five-day advanced course. These classes are relatively inexpensive and very appropriate for Coast Guard personnel.

Washington State's North Bend Marine Firefighting Center in North Bend, WA, is a similar training provider with more extensive simulation facilities. This is a favorite of fire department personnel.

Southwestern Oregon Community College offers training in fire fighting techniques that may be helpful to both Coast Guard and fire department personnel. For a catalog, fees and other course information, contact:

Darrel Saxon, Fire Sciences Coordinator
Empire Lakes
Coos Bay, OR 97240
Phone (503) 888-7296.

Texas A & M University offers several different fire fighting courses that may be useful to MSO personnel. In particular, the Marine Fire Fighting and Emergency Training Course offers a forty-hour, one-week program aimed at providing personnel in marine industry and transportation with expertise in various phases of shipboard fire fighting and emergency procedures. Basic areas of emphasis include fire prevention, fire suppression, and rescue. A schedule of classes and fees may be obtained from the University:

Northwest Area Contingency Plan

Texas A & M University System
Texas Engineering Extension Service
Fire Protection Training Division
Brayton Firemen Training Field
College Station, TX 77843-8000

Various Navy units throughout the U.S. offer advanced training, which is usually available to Coast Guard personnel. Though in the past, this training has most often been reserved for ships' crews, the value of the training for MSO personnel is obvious. The quality of the schools is excellent and they generally provide extensive practical experience. Navy courses would be appropriate for personnel serving as senior Coast Guard officers onscene and at the CAC. This helps ensure that Coast Guard actions and direction to other parties are appropriate. This is important considering one of the Coast Guard's roles in marine fire response is to advise local fire departments of the peculiarities of marine fire response as opposed to land based fires.

Finally, there is a marine safety training guide for Marine Firefighting Coordinator (MF), a role that a Coast Guard marine safety officer fills on the MSO/Group Portland response team. Currently, the Chief, U.S. Vessel Inspections in the Prevention Division fill this role. This training guide is completed through studying certain reference material and completing certain tasks on OJT. Additional resident training is strongly recommended for this assignment.

All local fire departments conduct continuous training programs for their personnel. This training will often cover all phases of fire fighting from prevention to overhaul and investigation. Considerable attention is also focused on logistics problems.

The importance of cooperation in cross training between Coast Guard units and local fire departments cannot be over emphasized. Personnel become familiar with each other's equipment and methods that will facilitate rapid response action and communications during actual fires. This is why Coast Guard participation in joint fire response exercises is so important.

Northwest Area Contingency Plan

8220 COMMAND STRUCTURE

The person in charge of a fire fighting response must be quickly identified. As a matter of maritime law and common practice, the master of a vessel is presumed to be in charge of, and capable of, onboard ship operations including shipboard firefighting. Merchant vessels are inspected and seamen are trained to ensure an onboard fire response capability. It is only at the specific request of the master, or when it becomes obvious that the vessel's condition threatens the port's safety or environment, that relieving the master of this responsibility should be considered. In cases in which it is determined that the master cannot or will not effectively take charge, the person in charge will be determined based on the area jurisdiction in which the fire occurs. For example, if a fire occurs in the Portland Fire Bureau's jurisdiction, then a chief fire officer from the Portland Fire Bureau shall designate the person in charge. In the event of a marine fire occurring outside a fire department's jurisdictional area, the Coast Guard could become the On Scene Commander.

Coast Guard response personnel shall be organized under the Integrated Command System (ICS). This is the system utilized by most local fire departments and is well suited for events involving multi-agencies. Refer to Annex I for how the Coast Guard response personnel fit into this structure and ICS forms in Annex XI.

Coast Guard personnel shall not be under the command of a non-Coast Guard Incident Commander. Orders from such an IC shall be passed through and evaluated by the COTP. Only those orders that will not create unwarranted risk for Coast Guard personnel and equipment shall be executed. It should be noted that the relationships among parties involved may change as the fire fighting efforts progress. It should also be noted that regardless of who is in charge of the fire fighting efforts, the COTP would carry out the duties as OSC.

A very important Coast Guard response assignment is the Marine Firefighting Coordinator (MFC). The MFC is the COTP's marine fire fighting technical expert and onscene liaison with response organizations in marine fire fighting incidents. As the COTP's designated representative, the MFC is responsible for the development and coordination of the planning, training, and response objectives of Coast Guard fire fighting assets. In addition to the recommended training for Coast Guard personnel in the Training Section of this Plan, the MFC should undergo advanced training in marine fire fighting strategy/tactics and damage control, and should have completed the appropriate Marine Safety Training and Qualification Booklets. The MFC should also be familiar with ICS and local fire services.

Northwest Area Contingency Plan

Refer to the Annex II on MSO/Group Duty Watch Structure for details.

8221 Command Staff

8222 Command Structure – Unified Command

8223 Health and Safety Officer

8223.1 Health and Safety Officer On Site

8224 Public Affairs Information Officer

This is an assignment filled by an officer at this Unit. During the marine firefighting exercise Weyco Cargo Dock 97, it was discovered that having the PIO at the scene was very beneficial. This person was able to get familiar with the situation faster and respond to the IC's public affairs needs better. Also, since it is likely the media will want to be on scene, it is better to have the PIO there to greet them. The Unit PIO should still request assistance from D13 when necessary.

8224.1 General Advice on Dealing With News Media

Before the press arrives:

- Ensure only designated persons speak to media;
- Set ground rules i.e. length of interview, topics to be covered, subjects that cannot be discussed;
- Select a couple key points you wish to make.

During the interview:

- Clean and proper uniform;
- In the field, flight and work uniforms are authorized;
- Keep eye contact with the interviewer, not the camera;
- Body language can speak louder than your words.

Your communication:

- Do not speculate or give opinion;
- Do not answer exaggerated or hypothetical questions;
- Avoid speaking for other commands or agencies, refer them to that command or agency;

Northwest Area Contingency Plan

- Reasons for not answering questions can include classified information, would interfere with ongoing investigation, interfere with a law enforcement case, next of kin have not been notified, you are not the appropriate command or agency to answer;
- There is no such thing as “off the record;”
- If you do not know, say so, then try to offer them somebody who does know;
- Avoid USCG acronyms;
- Never say “no comment,” if you cannot answer, say why;
- Do not just give one-word answers, explain a little;
- Do not let reporters put answers in your mouth;
- Turn negative questions into positive answers, remember the reporter’s questions will typically not appear on the news, only your answer;
- Do not let a rude reporter get to you, be polite and never show anger or sarcasm;
- Always end the interview on a positive note.

8224.2 Logistical Concerns for Press

8224.3 Media Contacts

8224.4 Media Addresses

8224.5 Joint Information Center

8224.6 News Release Samples

8224.7 Sample Fact Sheets

8224.8 Sample Press Release

8224.9 Sample News Advisory

8224.10 Checklist

8225 Legal Officer

8226 Marine Firefighting Coordinator

This role is assigned to a marine safety officer who has a high level of expertise in marine firefighting. This person advises the other agencies in aspects of firefighting peculiar to the marine systems i.e. stability, vessel equipment, etc. During the Weyco Cargo Dock 97 exercise, this person was at the Command

Northwest Area Contingency Plan

Post and his assistant (a duty inspector) was on board the vessel advising the firefighters. It was found that the closer to the scene these officers were, the more valuable their expertise was. Often, these officers saw issues that needed to be dealt with that they would not have known about if they were not there. This valuable contribution should be balanced with the risk of injury or death by being too close to the fire and its inherent dangers. Coast Guard's senior officer should make this decision on watch along with the sensibilities of the officers onscene.

8227 Command Posts

Once it has been decided to allow a burning vessel to enter port, or when a fire breaks out aboard a vessel in port, the need for a coordinated/integrated fire fighting effort is immediately created, because federal, state and local jurisdictions will be involved.

A Command Post will be established on scene by the responding fire department. The USCG OSC or representative should be on hand and maintain communications with Coast Guard resources involved. Other key personnel that would be on hand at the on scene Command Post include the vessel's officers or facility operators, the owner's representative, salvage and clean-up companies, a marine chemist, and port officials. The representatives present should have authority to make decisions to facilitate rapid and proper response.

In addition to the on scene Command Post, MSO Portland's Crisis Action Center (CAC) shall be staffed in accordance with this Plan.

8230 OPERATIONS

8231 Emergency Notifications

The Coast Guard COTP, Portland, Oregon, is charged with ensuring the safety of vessels, waterfront facilities, bridges, and the waterways for all coastal ports and waterways in the state of Oregon, those in Washington south of Queets, Washington (to include Grays Harbor and Willapa Bay), and the Columbia/Willamette Rivers system. Any fires that threaten the safety of vessels, waterfront facilities, bridges, or the navigable waterways within this area shall be immediately brought to the attention of the COTP through the following methods:

- Fire departments, upon receiving notification of a fire that meets the conditions above, are requested to relay the report to the nearest Coast Guard unit. The report is requested even when no Coast Guard assistance is

Northwest Area Contingency Plan

required or needed. This is necessary, because the COTP has duties that extend beyond fire fighting.

- Coast Guard units, upon receiving notification of a marine fire, shall immediately relay the information to MSO Portland in accordance with CCGD13 SOP. All units shall work closely with local fire departments to maintain communication links and facilitate inter-agency coordination.

MSO/Group Portland would typically be notified at the Communications Center. The OOD would complete the Vessel Fire Action Checklist from the Emergency Operations Manual (refer to Annex I for this document) with information supplied by the party making the notification. It is extremely important to get sufficient accurate information about the incident. However, this should be balanced with the urgency of the situation. If the notifying party is actually involved in the incident, one should understand their urgency to respond to the fire. Questions to the notifying party should be relevant and sensitive to the situation. Relevant information might include name of vessel/facility, type of vessel/facility, location of vessel/facility, extent of fire, available firefighting equipment, hazardous material, amount of oil on board, response action taken so far, number of crewmembers or facility personnel, injuries/fatalities, vessels and/or facilities nearby, and what other parties have been notified.

8231.1 MSO/Group Portland Internal Notifications (OOD Checklist)

The OOD would notify all the internal MSO/Group personnel listed on the Vessel Fire Action Checklist.

8231.2 Notification of External Parties

To ensure the timely development and coordination of fire fighting and marine safety resources, it is essential that all involved parties are promptly notified of marine fires under their jurisdiction. This could include other federal and state agencies, local fire departments, port authorities, local law enforcement agencies, private consultants and response organizations (marine chemists, salvage and environmental companies) and affected private parties. Various annexes in this Plan contain phone numbers of such parties. Local Port Authorities should be consulted during the planning stage to discern whether a burning vessel may be brought into their area. Phone numbers for Port Authorities are contained in Annex IV. Phone numbers for emergency services organizations are enclosed in Annex IV. Their services may be invaluable, particularly if an area must be evacuated or cordoned off to facilitate firefighting efforts.

Northwest Area Contingency Plan

The Public Information Officer shall field information requests from the press. If necessary, assistance may be obtained from the Thirteenth District Public Affairs staff.

8232 Burning Vessel Movement Considerations

A crucial decision that must be made by the COTP is whether or not a burning vessel should be allowed to enter or move within the port. Types of vessel movements that may be required in an emergency include movement from sea to an anchorage or a pier; from an anchorage to a pier; from a pier to an anchorage; grounding a vessel; or scuttling a vessel offshore.

These vessel movements should be thought out in advance and rehearsed as often as possible to ensure a rapid and considered response in the event of a real incident. Annexes VIII and IX provide much of the details needed to determine moorage, anchorage, grounding or scuttling sites, and response efforts.

8232.1 Decision To Allow A Burning Vessel To Enter Port Or Move Within The Port

Due to the limited resources available to fight an offshore fire, the COTP may be forced to consider allowing a burning vessel to enter port. The numerous considerations that are part of this decision can be found below, as well as in Volume VI of the Marine Safety Manual (MI6000.11). In addition to annexes VIII and IX, the information in Section 8600 concerning liability and surety bonds should be reviewed and considered as part of this decision.

The amount of information and number of considerations may seem too complicated to resolve in an emergency, but it is important that a thorough analysis of all risks be conducted. This is to prevent concern for a single vessel from narrowing our vision. We must remember a burning vessel is only a small part of the resources (other ships, ports, facilities, personnel, and marine environment) that must be protected. The COTP should approach such an incident by considering the navigable waterways as a system used by various parties for transportation, recreation, and commerce. The most important consideration must be how the overall system functions. A burning vessel must be considered as only a single element within that system. The COTP must not jeopardize the other elements to save a single vessel, if the risk to the system is too great. The possibility of having a ship sink in a key navigation channel, thus blocking it, or spreading the fire to a waterfront facility, must be evaluated.

Northwest Area Contingency Plan

There are numerous considerations that the COTP should evaluate when faced with the decision of whether or not to allow a burning vessel to enter or move within a port. The following information should be gathered and considered prior to making such a decision:

- Location and extent of fire,
- Status of shipboard firefighting equipment,
- Class and nature of cargo (HAZMAT),
- Possibility of explosion,
- Possibility of vessel sinking/capsizing,
- Hazard to crew or other resources where vessel is present,
- Forecasted weather (including bar conditions if applicable),
- Maneuverability of the vessel (i.e. Is it a dead ship, etc.),
- Availability (and willingness) of assist tugs,
- Effect on bridges under which the vessel must transmit,
- Potential for the fire to spread to the pier or pier structures,
- Firefighting resources available ashore and offshore,
- Consequences/alternatives if the vessel is not allowed to enter or move, and
- Potential for pollution.

The above considerations should be investigated by the fire department chief and COTP by examining the vessel and her cargo manifest before the vessel is allowed to enter port or move within the port.

The COTP should make a decision only after consultation with the Fire Department Chief, Port Director, Local government officials (i.e. Mayor, Director of Emergency Services), vessel owner's agent, and other experts to be consulted depending on the circumstances.

Northwest Area Contingency Plan

Entry to port or movement may be permitted when:

- The fire is already contained or under control,
- There exists little likelihood that the fire would spread,
- A greater possibility exists that fire could and would be readily extinguished with available equipment in port before encountering any secondary hazards of explosion or spread of fire
- All relevant parties consulted.

Entry to port or movement may be denied when:

- There is a greater danger that the fire will spread to other port facilities or vessels,
- The likelihood of the vessel sinking or capsizing within a navigation channel, and becoming an obstruction exists,
- The vessel might become a derelict,
- Unfavorable weather conditions preclude either the safe movement of the vessel under complete control or would hamper firefighting (look for high winds, fog, strong currents, etc.),
- Risk of a serious pollution incident by oil or hazardous substances exists; the COTP, in conjunction with Thirteenth Coast Guard District (m) and the Regional Response Team (RRT), shall assess the pollution risks and determine whether they are to be ordered to proceed to sea to reduce the pollution hazards.

Additional considerations:

- Safety broadcast and Notice to Mariners,
- Ordering the movement of other vessels or cargo that may be impacted,
- Locating the vessel to best facilitate use of available resources.

8233 Offshore Firefighting Considerations

In addition to the problems associated with any shipboard fire, an offshore incident is further complicated by the poor flow of information and difficulties in

Northwest Area Contingency Plan

supplementing the vessel's firefighting resources. Reports from the vessel may be confusing due to the language difficulties or the simple fact that the crew is too busy fighting the fire to provide detailed information. Until additional resources can be brought to bear, the vessel's firefighting equipment and crew will be the only resources available. Additional resources in the form of public or private vessels may not be close enough to respond in a timely manner and may be ill equipped to provide significant assistance. Therefore, the farther offshore a burning vessel is the less external aid it shall receive, but the less impact it has on vessel traffic and port operations. The closer to shore or a port a burning vessel is the more aid it is likely to receive, while its impact on vessel traffic and port operations is greater. In both cases, SAR would be Coast Guard's most common response.

8233.1 Coast Guard Offshore Resources

During an offshore fire, ships and aircraft become important resources. Aircraft may provide a timely source of information during the early stages of a response and can be used for personnel or equipment transfers. Coast Guard vessels are limited in their ability to assist in a shipboard fire, but are much better equipped than commercial vessels and have damage control teams that are drilled regularly in shipboard firefighting. In addition to improving communications, larger Coast Guard vessels with flight decks can be used to stage equipment flown to the scene. Strike Force personnel and equipment can be useful in firefighting and dewatering evolutions. All requests for Coast Guard equipment (including ships and aircraft) and supplies, whether from within the COTP Portland area or not, should be directed to the Thirteenth District Command Center.

8233.2 Department Of Defense Offshore Resources

Firefighting equipment available from various Department of Defense (DOD) sources is provided in Annex V. In addition to the transportation capabilities discussed there, DOD aircraft and vessels can be invaluable in an offshore fire situation for the same reasons discussed for Coast Guard assets. The possibility of Naval or Army Corps of Engineers vessels operating in the vicinity which can assist should not be overlooked. All requests for DOD assistance should be made to the DOD representative on the Regional Response Team, via the Chief of the Marine Safety Division of the Thirteenth Coast Guard District.

8233.3 Other Offshore Resources

Any ship becomes a valuable resource during an offshore vessel fire, even those with small crews and minimal firefighting capability. At a minimum, another

Northwest Area Contingency Plan

vessel can provide a means of escape for a burning vessel's crew should their efforts to control the fire fail.

Vessels in the area may be notified of a situation via AMVER or with a Broadcast Notice to Mariners. Tug companies in the vicinity may assist in fighting the fire, moving a dead ship or transporting equipment. While few vessel operators would be reluctant to assist in a life-threatening situation, vessel owners may not be willing to respond to a firefighting situation that could risk their vessels or crew in order to protect a ship or cargo once the crew is safe.

8233.4 Offshore Scuttling Area Selection

If a vessel cannot be safely moved to a port, and it is possible that the vessel and cargo could be lost (either intentionally or not) the vessel should be moved to an area where environmental damage will be minimized. The information in this section should be reviewed to identify the best area to move the vessel. The Environmental Protection Agency should also be consulted on any decision concerning scuttling of a vessel. Scuttling must be conducted IAW COMDTINST 16451.5 and 40 CFR 229.3. See the Annex on Scuttling Areas for specific locations.

8234 Positioning A Vessel For Firefighting

This section addresses the positioning of a vessel that is on fire while underway, or a vessel that is docked. No vessel on fire should be moved without the permission of the COTP, except under the most urgent conditions.

The success or failure of a shipboard fire response effort will, in large part, be determined by the vessel's location. The likelihood of successfully fighting a fire on a remotely located vessel is small compared to a vessel located near sufficient sources of firefighting resources.

8234.1 Pier Selection

Several considerations enter into the selection of piers as a location:

- Paramount is the combustibility/flammability of pier structures and contiguous facilities,
- Availability of high-pressure water
- Access to response boats and vehicles,
- Minimizing risk of impeding navigation, and
- Risk to nearby vessels and facilities.

Northwest Area Contingency Plan

Much of the information needed to determine the suitability of a facility is in the facility survey file maintained by the Prevention Department.

8234.2 Anchorage And Grounding Site Selection

When choosing anchoring or grounding locations, some of the same factors must be considered, as well as its effect on navigation. The possibility of the vessel sinking or becoming a derelict is very real and could prove a greater harm to the marine system than the loss of the single vessel. Other important considerations are:

- Bottom material – soft enough so that the ship's hull will not be ruptured;
- Water depth – shallow enough so that the vessel could not sink below the main deck level, yet deep enough so that fire boats, salvage barges, and tugs can approach; tides and other river level fluctuations must be considered;
- Area weather – do not choose areas known to have strong winds or currents that could hamper firefighting or salvage efforts.

The location and suitability of boat ramps and piers to be used as staging areas must also be evaluated when considering grounding or anchorage sites.

Refer to Annex VIII on specific grounding and mooring sites.

8235 Response Actions

Size-up is one the initial and critical actions taken in response to a marine fire. This involves evaluation of available facts and probabilities. The size-up consists of six steps to rapidly form a deliberate plan of action:

- Gather facts,
- Assessing probabilities,
- Determining resources
- Applying basic fire fighting principles
- Deciding a course of action, and
- Formulating a plan of operations.

Northwest Area Contingency Plan

Pertinent facts might include location of fire, location of crew/personnel, acquiring vessel fire plan, vessel/facility condition, stability issues, type and condition of cargo, and response equipment available.

The COTP, Portland, Oregon, has developed a comprehensive response plan designed to best accomplish Unit members' marine safety duties while being consistent with current directives and guidelines regarding fire fighting. Often a marine fire incident can generate confusion among the involved agencies, which could well prove disastrous. This can be overcome by designing plans of action in conjunction with the involved agencies that detail the actions and responsibilities of each of them.

The Captain of the Port is responsible for Coast Guard response efforts to a vessel fire. The COTP has overall control of all Coast Guard forces and equipment involved in the response to a marine fire. However, a vessel fire may be initially treated as an SAR case under control of the assigned SAR Mission Controller until a determination of the situation has been made by on scene forces as to the status of the vessel and its crew, the extent of the fire, ongoing response efforts, fire department and other agency involvement, and other pertinent information. At this time, the COTP Portland may assume the duties of On Scene Coordinator and carry out his/her responsibilities accordingly.

The choice among courses of action delineated below is based upon where the incident occurs with respect to the limits of the various fire department jurisdictions, the COTP area of responsibility, the MSO/Group Portland SAR zone, and the Coast Guard policy as described in the Marine Safety Manual.

For more detail on MSO response procedures, refer to the Annex I on Marine Fire Response Procedures.

8235.1 Coast Guard action in a Fire Department's Jurisdiction Within Group

8208 Portland's SAR Zone and COTP Portland's Zone

The response action to be taken in any fire department jurisdiction in Group Portland's SAR zone follows:

- Upon the receipt of a report of fire, the Coast Guard Communications Center watchstander shall notify the OOD, who shall complete the Vessel Fire Action Checklist.
- The OOD shall notify designated personnel on the checklist.

Northwest Area Contingency Plan

- Coast Guard personnel shall respond as directed by Annex I.
- The appropriate fire bureau shall be contacted if they have not already been advised of the fire. If the fire is in the Portland Fire Bureau's, Longview, or St. Helens Fire Department's area of jurisdiction, one or more fireboats will likely be dispatched to the scene. Communications shall be established on Channels 16 or 22A between the MSO's UTB (if dispatched) and the fireboats.
- If the fire occurs in the jurisdictional area of a fire department that does not have a fireboat, it should be determined whether the local fire department has sought any outside assistance from Portland, St. Helens, or Longview Fire Departments. If no outside assistance has been sought, the options available should be presented to the local fire department, and a plan of action should be coordinated with the Coast Guard if necessary.
- Unless involved in a serious SAR case, the OOD shall dispatch a boat to the scene immediately. If available, the UTB should be selected. This should occur regardless of whether or not the fire department requests USCG assistance. The boat crew should be rapidly briefed concerning the extent of the fire.
- Response team personnel, acting as On-Scene Coordinator's representative shall be dispatched to meet with the Fire Department Incident Commander in charge of shoreside operations. This will provide a communications link between the COTP and the Fire Department. Orders for coordination of Coast Guard fire fighting activities at the scene shall be passed through the Coast Guard shore response team (On-Scene Coordinator's representative). Communications shall be established between the shore response team (OSC rep), the MSO, and the UTB, on Channel 83 VHF-FM, or by cellular telephone.
- Issue a safety broadcast, or Urgent Marine Information Broadcast (UMIB) to advise the maritime community of the fire and presence of waterborne fire fighting units on-scene.
- As a general rule, MSO Portland will provide fire fighting services as requested by the fire department unless, in the opinion of the shoreside Coast Guard On Scene Coordinator or coxswain, they are beyond the capability of the boat, either because of the boat's characteristics, inadequate personal protective equipment, or low experience level of the crew. All actions shall be reported to the OOD at the time services are

Northwest Area Contingency Plan

requested. Coast Guard forces shall never take action without the approval or at the request of the shore-based Incident Commander. Where Coast Guard fire fighting services are not needed, the Coast Guard boat shall remain on scene to direct marine traffic or provide such other services as appropriate.

- If a fire is reported to be ashore at or on a ship at a grain elevator or oil terminal, the following actions will be taken:
 - Unaffected vessels moored to the facility are to be moved immediately, with or without tugs and pilots, depending upon circumstances. A COTP order may be required.
 - Movement of other vessels in the area will be considered based upon degree of risk.
 - Pilots and tugs are to be deployed as early as possible.
- Vessels moored at other types of facilities involved in a fire may be moved based upon the degree of danger to the vessel.
- Coast Guard personnel will board all vessels in a fire area and inform the Senior Deck Officer to secure ship operations and be prepared to get underway.
- Inform the local agents of vessels involved in the incident of the situation and any anticipated movement of their vessels.
- Vessels to be moved are to be directed to a harbor, anchorage, or another dock away from the fire area.
- If appropriate, a safety zone will be established for the protection of vessels, water, and shore areas.

Additional considerations if the fire is within the Portland Fire Bureau's jurisdiction follow:

- The fire department dispatcher will immediately call the MSO Portland Communication Center concerning any waterfront fire or incident. Our communications watchstander shall alert the OOD and other appropriate personnel.

Northwest Area Contingency Plan

- Our first notification may not originate from the fire department dispatcher, as that person is often unable to complete all the notifications until additional help arrives. In those cases, our first notification may come from the fire boat en route to the scene via Channel 16.
- Fire fighting is the primary responsibility of the city government, operating through the fire department. Overall fire fighting control will be under the direction of the shore-based fire Incident Commander on scene. The Portland Fire Bureau no longer has a marine division, and consequently, the command and control of all fireboats also falls under the shore-based fire Battalion Chief on scene. The Coast Guard small boats responding will have direct communications with Portland Fire Bureau fire boats (Channels 16 or 22A) and the Coast Guard On-Scene Coordinator (Channel 83) positioned with the shore-based Battalion Chief.

8235.2 Coast Guard Action Within Fire Department Jurisdiction Within COTP Portland's Zone But Outside of Group Portland's SAR Area (Grays Harbor, Astoria, Coos Bay, and Newport)

The response actions for a marine fire within fire department jurisdiction and within COTP Portland's zone but outside Group Portland's SAR area follows:

- Upon notification of a waterfront fire, verify the report and ensure the appropriate fire department has been notified.
- Complete the Vessel Fire Action Checklist. The OOD and designated personnel shall respond as directed by Annex I.
- Coast Guard SAR forces on scene shall:
 - Keep COTP, Portland, Oregon, informed of the situation in accordance with CCGD13 SOP.
 - Provide transportation for MSO personnel to the vessel, if necessary.
 - Assess the situation as to potential water pollution threat to facilitate report messages (POLREP's) as necessary.
 - Report to the senior fire department official and establish communications.
 - Keep a log of times and key events of the incident.

Northwest Area Contingency Plan

8235.2 Fire Occurring Outside a Fire Department Jurisdiction But Within COTP

8209 Portland's Zone

There are numerous fire departments and fire districts along the lower Columbia and Willamette Rivers. There are also a great number of districts along the coastal regions of COTP Portland zone. However, it is still possible that a vessel fire could occur in an area not within any fire department's jurisdiction. (The jurisdiction of some fire departments ends at the end of the dock or the high water line.).

If a vessel fire occurs outside one of these jurisdictions (i.e. upper Columbia and Snake rivers, coastal waters, and certain portions of the lower Columbia River), the COTP Portland would assume On-Scene Coordinator responsibilities and direct Coast Guard resources through the On-Scene Coordinator and coordinate the response effort with other fire departments and agencies.

Under special circumstances, a Portland Fire Bureau fireboat may be dispatched to an area outside of their normal fire fighting jurisdiction to assist other agencies. Requests for such assistance should normally be directed to the Portland Fire Bureau. A strong argument for Portland Fire Bureau involvement in the lower Columbia River exists because of the drastic impact a blockage of that area would have on the Port of Portland.

The Fire Bureau will consult with the appropriate city commissioner or mayor to secure permission to respond. Additional means of obtaining equipment or assistance from one area of Oregon and providing it to another area would be accomplished by the invocation of the "State Conflagration Act" (ORS 476-510-476.610), which may be invoked by the Governor (Contact the Oregon State Emergency Services, at (503)378-4124.).

At this time, Washington does not have a State Conflagration Act. However, some mutual aid agreements exist.

8236 Safety Zones

To secure the safety of waterfront facilities and vessels, the COTP may find it helpful to control or restrict traffic in the affected areas.

COMDINST 3170.3 describes the characteristics of limited access areas, including safety zones, security zones, restricted areas, and regulated navigation areas. Authority is granted to the COTP to establish safety zones by

Northwest Area Contingency Plan

the Ports and Waterways Safety Act (33 USC 1221 et seq.). A safety zone could be established around a burning vessel to facilitate access for fire or rescue units and to protect uninvolved persons or vessels, or it could be used to ensure the safer transit of a vessel carrying a dangerous cargo. They are intended to be established on a temporary, and usually, emergency basis to deal with a situation beyond the scope of normal safety and security measures.

8237 Communications

Communication between response team members and other agencies is critical. Mobile phone numbers and radio channels must be pre-assigned and periodically confirmed and tested during exercises. Consideration should be given to steel hulls inhibiting radio transmission with alternated comms planned ahead of time.

The FCC has assigned 154.126, 154.260, and 154.290 MHz as the Fire Mutual Aid Radio Systems (FMARS) frequencies for multi-agency response to a common incident.

Spare batteries, recharging capability, spare radios and mobile phones should be available in case the incident lasts longer than anticipated or the number of response personnel is greater than expected.

Lessons learned from the fire response exercise Weyco Cargo Dock 97, showed that the mobile phones were invaluable. Also, the radio channels assigned must be confirmed periodically throughout the event, as it may become necessary to change them as more personnel arrive and overcrowd the originally assigned frequency.

8238 Stability

Vessel stability can be defined as its ability to right its self from an inclining position. During firefighting, excess water onboard can create flooding and free surface effect. This could prove disastrous for the vessel leading to list and even sinking. Since local fire services do not typically have training in this field, there is substantial risk that this could occur. This is the area of expertise that other response agencies will depend upon the Coast Guard to contribute. The MFC would typically be the USCG officer who would provide this advice. If nobody from the Coast Guard is available for this role, a naval architect/engineer should be identified to be available for such advice. Good references abound on this topic. At a minimum one should refer to NFPA 1405.

Northwest Area Contingency Plan

8240 PLANNING

8241 Introduction

U.S. Coast Guard policy advocates extensive use of contingency plans as tools to assist local commanders in accomplishing their many tasks. Some of the aims of contingency planning are detailed in the Marine Safety Manual and include:

- To prevent damage, destruction, and loss of life by minimizing the probability that an event will occur;
- To minimize damage or destruction through prompt detection, immediate response and implementation of corrective action;
- To improve decision-making of the Incident Commander;
- To provide training to personnel participating in response, mitigation, and coordination phases of a marine emergency;
- To maintain liaison with appropriate federal, state, and local organizations.

Some specific objectives of contingency planning follow:

- To prevent loss of life or personal injury, damage and destruction of vessels, cargoes, structures, and facilities in U.S. ports and waterways, and damage to the marine environment, by reason of accidental, intentional means, or natural phenomena;
- To maintain safe, secure, and orderly continuation of marine traffic and the acceleration of such traffic, if so required by national interests, in the face of accidental, intentional or natural disasters;
- To maintain adequate training through planning prior to a marine incident;
- To maintain continual contact with local agencies having interest in or responsibilities for a specific event and maintain a check on their resource capabilities and limitations;
- To outline Unit capabilities and limitations with respect to available resources through all phases of the event.

Northwest Area Contingency Plan

8242 Inclusion in Area Contingency Plan and Geographical Response Plans

Change 4 to Volume VI of the Coast Guard Marine Safety Manual directs the revision of Marine Fire Fighting Contingency Plans and the integration of those plans into the Area Contingency Plan.

8243 Annual Review and Update

Every year this Plan shall be reviewed for accuracy and coherence with District and Commandant guidance. Also, any lessons learned from exercises and real life fire response shall be incorporated in this Plan. Possible exercise scenarios follow:

- Waterfront facility (break bulk or bulk liquid)
- Freight vessel (break bulk or container)
- Tank barge
- Tank vessel (cargo tank or engine room)
- Bulk solid cargoes (cargo or engine room)
- Passenger vessel
- Liquefied gas carrier.

8250 LOGISTICS

8251 Equipment lists by port are included in Annex IV.

8260 FINANCE

8261 Funding

In general, funding for USCG firefighting activities must come from Coast Guard Operating Expense (OE) funds. The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) Trust Fund, and the Oil Spill Liability trust Fund (OSLTF) may be available to reimburse firefighting expenses. CERCLA and OSLTF funds are only authorized for pollution related activities, so pollution must occur as a part of the fire incident.

8262 Liability/Surety Bond/COFR

Northwest Area Contingency Plan

When a vessel's Master or other representative desires to enter a port with the hopes of saving the vessel and cargo, the owners, master, and agents should be required to indemnify and hold harmless the port, its board, and federal/local governments for damage or injury suffered as a result of such a fire or movement of the vessel.

A surety bond should also be required. The amount of the bond should be at least equal to the estimated cost of removing the sunken vessel from the port. The vessel's liability for oil removal costs should be covered by an insurer, as evidenced by a valid Certificate of Financial Responsibility (COFR), if the vessel is over 300 GRT. This COFR should be verified before the vessel is allowed to enter port. The Prevention Department shall provide assistance regarding the COFR.

Liability insurance covering damage the vessel may cause to other property should also be investigated since the possibility exists that the vessel could set fire to other vessels or facilities. Litigation might ensue against the agencies that allowed the vessel to enter the port holding them responsible for damage caused by the burning vessel. The assistance of the District legal officer should be sought to avoid legal problems that could involve the Coast Guard.

It should be noted, however, that while the above assurances are highly desirable, the timely acquisition of the necessary bonds or insurance may not be possible before the action required to save the vessel is taken.

8270 FOR DISTRICT/AREA COMMITTEE DESIGNATION

8280 FOR DISTRICT/AREA COMMITTEE DESIGNATION

8290 RESERVED FOR FUTURE HEADQUARTERS DESIGNATION